

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

Jointly Administered

EPIC Companies Midwest, LLC,
EPIC Companies Midwest 2023, LLC,
EPIC Employee, LLC,
EOLA Capital, LLC, and
EC West Fargo, LLC,

Bankruptcy No. 24-30281
Bankruptcy No. 24-30282
Bankruptcy No. 24-30283
Bankruptcy No. 24-30284
Bankruptcy No. 24-30285

Debtors.¹

Chapter 11

**SECOND APPLICATION OF FREDRIKSON & BYRON, P.A. FOR ALLOWANCE OF
FEES AND EXPENSES AS CHAPTER 11 COUNSEL FOR THE DEBTORS FROM
SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

1. Steven R. Kinsella and Fredrikson & Byron, P.A. (collectively, “Fredrikson”) make this Application for allowance of fees for professional services rendered and for reimbursement of expenses incurred as Chapter 11 counsel for EPIC Companies Midwest, LLC, EPIC Companies Midwest 2023, LLC, EPIC Employee, LLC, EOLA Capital, LLC, and EC West Fargo, LLC (collectively, the “Debtors”) between September 1, 2024 and September 30, 2024 pursuant to 11 U.S.C. § 330.

2. In support of this Application, Fredrikson respectfully states as follows:

JURISDICTION

3. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334 and Fed. R. Bankr. P. 5005. This a core proceeding pursuant to 28 U.S.C. § 157(b). Venue

¹ In accordance with Fed. R. Bankr. P. 2002(n) and 1005 and 11 U.S.C. § 342(c), as applicable, the Debtors’ address is 400 10th Street SE, Minot, ND 58701 and their Employer Identification Numbers (EINs) are as follows: 83-2840705 (EPIC Companies Midwest, LLC), 88-3709518 (EPIC Companies Midwest 2023, LLC), 88-4112082 (EPIC Employee, LLC), 88-0554720 (EOLA Capital, LLC) and 82-5331354 (EC West Fargo, LLC).

is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The petitions commencing these Chapter 11 cases were filed on July 8, 2024 (the “Petition Date”). The cases are currently pending before this Court.

4. This Application arises under 11 U.S.C. §§ 503(b)(2), 328(a), 330, and 331. This Application is filed under Fed. R. Bankr. P. 2016 and 2002(a)(6). Notice of this Application is provided pursuant to the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court’s order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). (ECF No. 124.)

BACKGROUND

5. On the Petition Date, the Debtors filed an application to employ Fredrikson as Chapter 11 counsel for the Debtors effective July 8, 2024. (ECF No. 13.) The Court approved the application to employ Fredrikson on July 25, 2024. (ECF No. 49.) A copy of that order is attached as **Exhibit A**.

6. On the Petition Date, the Debtors also filed a motion for an order establishing interim compensation procedures. (ECF No. 11.) The Court entered an order on August 14, 2024 granting the motion and allowing Fredrikson to file monthly applications for compensation. (ECF No. 72.) A copy of that order is attached as **Exhibit B**.

7. This is Fredrikson’s second application for allowance of fees and expenses under 11 U.S.C. § 331. Fredrikson’s first application was filed on September 16, 2024 and covered the period from July 8, 2024 through August 31, 2024. (ECF No. 107, the “First Application.”) The First Application sought a total of \$81,651.96 in fees and expenses. (*Id.*)

8. Prepetition, the Debtors paid Fredrikson \$58,850 for fees and expenses incurred by Fredrikson prior to the Petition Date. Before filing, Fredrikson applied the retainer to prepetition fees and expenses, leaving a balance of \$1,153.50, which Fredrikson is holding in trust (the

“Chapter 11 Retainer”). In the First Application, Fredrikson asked permission to apply the Chapter 11 Retainer against fees and expenses incurred in the days leading up to the Petition Date which may not have been fully paid prior to filing. As of the date of this Application, the First Application is still pending before this Court and is set for hearing on October 21, 2024.

9. Fredrikson believes that the Debtors are current in payment of ordinary operating expenses and any allowed administrative expenses, that any quarterly fees have been or will be paid as required to the United States Trustee, and that all monthly operating reports are being timely filed, including pursuant to any extensions granted by the United States Trustee.

RELIEF REQUESTED

1. **Post-Petition Fees.** By this Application, Fredrikson requests allowance of fees for professional services rendered during these Chapter 11 cases between September 1, 2024 and September 30, 2024 in the amount of **\$20,068.50**, and reimbursement of expenses in the amount of **\$103.50**, for a total of **\$20,172.00**.

2. The professional services rendered by Fredrikson are detailed on the attached **Exhibit C**. Those services include the tasks specifically described below:

(5000) Case Administration: \$2,551.00

Services include drafting and revising motion to establish settlement procedures and ensuring compliance with service requirements.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.2	2024	\$575	\$115.00
Katherine A. Nixon	4.1	2024	\$420	\$1,722.00
Shataia Stallings	3.4	2024	\$210	\$714.00
TOTAL	7.7			\$2,551.00

Blended Hourly Rate:	\$331.30
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(5001) Asset Analysis and Recovery: \$6,302.50

Services include communicating with borrowers and their counsel; requesting and reviewing real estate and lien records; and meeting with the Debtors' Chief Restructuring Officer (the "CRO") regarding complaints against borrowers.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	8.5	2024	\$575	\$4,887.50
Katherine A. Nixon	2.8	2024	\$420	\$1,176.00
Breann Jurek	0.8	2024	\$220	\$176.00
Shataia Stallings	0.3	2024	\$210	\$63.00
TOTAL	12.4			\$6,302.50

Blended Hourly Rate:	\$508.27
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(5007) Claims Administration and Objections: \$546.00

Services include reviewing and analyzing proofs of claim and reviewing the Court's order extending the deadline to file proofs of claim.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.1	2024	\$420	\$42.00
Shataia Stallings	2.4	2024	\$210	\$504.00
TOTAL	2.5			\$546.00

Blended Hourly Rate:	\$218.40
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(5010) Employment and Fee Applications: \$3,094.00

Services include drafting and finalizing Fredrikson's first fee application; reviewing compensation procedures for CRO; and assisting in the preparation of CRO's monthly staffing report.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	1.4	2024	\$575	\$805.00
Katherine A. Nixon	5.3	2024	\$420	\$2,226.00
Shataia Stallings	0.3	2024	\$210	\$63.00
TOTAL	7			\$3,094.00

Blended Hourly Rate:	\$442.00
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(5012) Financing and Cash Collateral: \$2,510.00

Services include drafting and revising second cash collateral motion and drafting cash collateral stipulation.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	4.0	2024	\$575	\$2,300.00
Katherine A. Nixon	0.5	2024	\$420	\$210.00
TOTAL	4.5			\$2,510.00

Blended Hourly Rate:	\$557.78
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(5013) Meetings and Communications with Creditors: \$3,359.50

Services include extensively communicating with creditors and their counsel; drafting motion to limit notice to creditors; communicating and meeting with counsel for the Official Committee of Unsecured Creditors; and responding to requests to change addresses.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	2.3	2024	\$575	\$1,322.50
Katherine A. Nixon	4.7	2024	\$420	\$1,974.00
Shataia Stallings	0.3	2024	\$210	\$63.00
TOTAL	7.3			\$3,359.50

Blended Hourly Rate:	\$460.21
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(5015) Plan and Disclosure Statement: \$57.50

Services include analyzing plan filing deadlines.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.1	2024	\$575	\$57.50
TOTAL	0.1			\$57.50

Blended Hourly Rate:	\$575.00
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(5018) Reporting: \$1,648.00

Services include corresponding with court staff regarding address changes; preparing and updating service lists; communicating with the CRO regarding monthly operating reports; and assisting in the preparation of monthly operating reports.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.2	2024	\$575	\$115.00
Katherine A. Nixon	0.9	2024	\$420	\$378.00
Shataia Stallings	5.5	2024	\$210	\$1,155.00
TOTAL	6.6			\$1,648.00

Blended Hourly Rate:	\$249.70
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TOTAL POST-PETITION FEES: \$20,068.50

3. **Reimbursement of Expenses.** In the course of this representation, Fredrikson has also incurred expenses detailed as part of Matter No. 5000 on **Exhibit C**, and requests allowance thereof as follows:

<u>Expenses</u>	<u>Amount</u>
Lien Search for EPIC Entities	\$103.50
TOTAL	\$103.50

TOTAL EXPENSES: \$103.50

4. All services for which fees are requested by Fredrikson were performed for and on behalf of the Debtors, and not on behalf of any committee, creditor, or other person.

5. The amount requested constitutes reasonable compensation for actual, necessary services rendered by Fredrikson, based on the nature, the extent, and the value of such services, the time spent on such services, and the cost of comparable services other than in a case under Title 11. Fredrikson has not entered into any agreement, express or implied, with any other party-in-interest, including the Debtors, any creditor, receiver, trustee, or any representative of any of them, or with any attorney for such party-in-interest in the proceedings, for the purpose of fixing fees or other compensation to be paid to such party-in-interest in the proceedings for services

rendered or expenses incurred from the assets of the estate in excess of the compensation allowed by law.

WHEREFORE, Fredrikson respectfully requests that the Court enter an order:

- A. Allowing Fredrikson's fees incurred between September 1, 2024 and September 30, 2024 in the amount of \$20,068.50, and expenses in the amount of \$103.50, totaling \$20,172.00;
- B. Authorizing the Debtors to pay Fredrikson such allowed postpetition fees and expenses;
- C. Granting administrative expense priority to Fredrikson's allowed fees and expenses; and
- D. Granting such other and further relief as may be just and proper.

Dated: October 16, 2024

/e/ Steven R. Kinsella

Michael S. Raum (#05676)
FREDRIKSON & BYRON, P.A.
51 Broadway, Suite 400
Fargo, ND 58102-4991
701.237.8200
mraum@fredlaw.com

Steven R. Kinsella (#09514)
Katherine A. Nixon (*pro hac vice* MN #0402772)
FREDRIKSON & BYRON, P.A.
60 South 6th Street, Suite 1500
Minneapolis, MN 55402-4400
612.492.7000
skinsella@fredlaw.com
knixon@fredlaw.com

ATTORNEYS FOR DEBTORS

AFFIDAVIT

I, Steven R. Kinsella, an attorney at the law firm of Fredrikson & Byron, P.A., declare under penalty of perjury that the foregoing Second Application of Fredrikson & Byron, P.A. for Allowance of Fees and Expenses as Chapter 11 Counsel for the Debtors from September 1, 2024 Through September 30, 2024 is true and correct according to the best of my knowledge, information, and belief.

Dated: October 16, 2024

/s/ Steven R. Kinsella
Steven R. Kinsella

EXHIBIT A

CourtAlert® Case Management

From: ecf@ndb.uscourts.gov
Sent: 7/25/2024 12:56:27 PM
To: nate_olson@ndb.uscourts.gov
Subject: Ch-11 24-30281 EPIC Companies Midwest, LLC Order on Application to Employ

CAUTION: EXTERNAL E-MAIL

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30-page limit do not apply.

U.S. Bankruptcy Court

District of North Dakota

Notice of Electronic Filing

The following transaction was received from vck, Court entered on 7/25/2024 at 12:56 PM CDT and filed on 7/25/2024

Case Name: EPIC Companies Midwest, LLC

Case Number: [24-30281](#)

Document Number: [49](#)

Docket Text:

Order Approving Application to Employ Steven R. Kinsella and Fredrikson & Byron, P.A. as counsel for Debtor EPIC Companies Midwest, LLC effective July 8, 2024 (Related Doc. [13]). The application to employ is APPROVED subject to the limitations on compensation provided by 11 U.S.C. § 328. This order is not a determination that the services or rates charged are necessary and reasonable. The person or entity employed under this order shall file a fee application in accordance with the Bankruptcy Code and Federal Rules of Bankruptcy Procedures. See Fed. R. Bank. P. 2016, 2017 and 11 U.S.C. 329, 330. Applicant must also comply with Local Rules. As required by applicable federal rule or statute, the Movant shall serve this docket text only order on all appropriate parties that will not receive notice of electronic filing. By Judge Shon Hastings (Text order only). Signed on 7/25/2024 (vck)

The following document(s) are associated with this transaction:

24-30281 Notice will be electronically mailed to:

Douglas Christensen on behalf of Creditor Beth Holmes
dougc@grandforkslaw.com,
sarah@grandforkslaw.com;jen@grandforkslaw.com;julie@grandforkslaw.com

Michael Gust on behalf of Interested Party Bank Forward
mlgfilings@andersonbottrell.com, jernst@abstlaw.net

Joseph D Hackman on behalf of Interested Party Bank Forward
jhackman@abstlaw.net

Peter B. Hankla on behalf of Interested Party Randy and Dorothy Henke
phankla@mcgeelaw.com

Steven R Kinsella on behalf of Debtor EC West Fargo, LLC
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EOLA Capital, LLC
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Companies Midwest 2023, LLC
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Companies Midwest, LLC
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Employee, LLC
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

John M Krings, Jr. on behalf of Creditor Cornerstone Bank
john@kaler-doeling.com, janae@kaler-doeling.com

Katherine A. Nixon on behalf of Debtor EPIC Companies Midwest, LLC
knixon@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Richard P. Olson on behalf of Creditor Essential Living Inc
rpolsonecf@minotlaw.com, rpolson@minotlaw.com

Richard P. Olson on behalf of Creditor Bruce & Diane Walker
rpolsonecf@minotlaw.com, rpolson@minotlaw.com

Robert B. Raschke
USTPRegion12.SX.ECF@usdoj.gov

Michael S Raum on behalf of Debtor EPIC Companies Midwest, LLC
mraum@fredlaw.com, mraum@fredlaw.com;dtaylor@fredlaw.com

Katrina A. Turman Lang on behalf of Creditor Dietz Properties, LLC
klang@woldlaw.com, melanie@turmanlaw.com

Katrina A. Turman Lang on behalf of Creditor Candice Dietz
klang@woldlaw.com, melanie@turmanlaw.com

Katrina A. Turman Lang on behalf of Creditor Larry Dietz
klang@woldlaw.com, melanie@turmanlaw.com

Sarah J. Wencil on behalf of U.S. Trustee Robert B. Raschke
sarah.j.wencil@usdoj.gov

Benjamin Williams on behalf of Creditor Cullen Insulation, Inc.
ben@kennellybusinesslaw.com, beth@kennellybusinesslaw.com

Benjamin Williams on behalf of Creditor Daniel Frisch
ben@kennellybusinesslaw.com, beth@kennellybusinesslaw.com

24-30281 Notice will not be electronically mailed to:

EXHIBIT B

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

Jointly Administered

EPIC Companies Midwest, LLC,
EPIC Companies Midwest 2023, LLC,
EPIC Employee, LLC,
EOLA Capital, LLC, and
EC West Fargo, LLC,

Bankruptcy No. 24-30281
Bankruptcy No. 24-30282
Bankruptcy No. 24-30283
Bankruptcy No. 24-30284
Bankruptcy No. 24-30285

Debtors.

Chapter 11

**ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR RETAINED PROFESSIONALS**

Debtors filed a Motion for an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief. Doc. 11. Pursuant to the notice of the Motion [Doc. 16], objections to the Motion were due by July 30, 2024.

Debtors served notice of the Motion. The Court received no objections to the Motion. The Court held a hearing on the Motion on August 14, 2024. Based upon the Motion and the Declaration of Patrick Finn [Doc. 6] and for the reasons stated on the record at the August 14, 2024, hearing, the Court finds that the circumstances of these cases warrant granting the relief provided below.

IT IS ORDERED that, except as otherwise provided in any order of the Court, professionals employed in this bankruptcy case, including Fredrikson & Byron, P.A., shall be permitted to seek interim payment of compensation and reimbursement of expenses by filing monthly applications for interim compensation and reimbursement of expenses.

IT IS FURTHER ORDERED that Debtors are authorized to pay all reasonable amounts invoiced by Lighthouse Management Group, Inc. (“Lighthouse”) for fees and expenses on a bi-weekly basis.

IT IS FURTHER ORDERED that Lighthouse will file with the Court and serve on Debtors, the United States Trustee, and any statutory committee appointed in this case (the “Notice Parties”) a monthly staffing report, filed and served by the 20th of each month for the previous month, identifying the Lighthouse employees who worked on this case, the total hours billed by Lighthouse, and a summary of the tasks performed. Lighthouse will also file with the Court and serve on the Notice Parties a quarterly compensation report by the 20th of each month following the end of a quarter, showing the total fees and expenses for the preceding quarter. These reports will be deemed applications for interim compensation under sections 328 and 330. Parties in interest may object to the reports within 21 days after notice. The Court will rule on the applications after the deadline to object passes or after a hearing on the application.

IT IS FURTHER ORDERED that Debtors will allocate the fees and expenses approved among Debtors pro rata if the professionals charge for tasks that generally apply to all cases and to the appropriate Debtor if the tasks relate solely to a specific Debtor.

Dated: August 14, 2024.



SHON HASTINGS, JUDGE
UNITED STATES BANKRUPTCY COURT

EXHIBIT C

Fredrikson

Invoice: 1883336
Invoice Date: October 7, 2024
Client Account: 097807.5000

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through September 30, 2024

Regarding: Case Administration

Total for Current Legal Fees:	\$ 2,551.00
Total For Current Costs and Other Charges:	\$ 103.50
Total For Current Invoice:	\$ 2,654.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:



Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

Please remit this page with your payment. Thank you. We appreciate your business.

Fredrikson

Invoice: 1883336
Invoice Date: October 7, 2024

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
09/05/24	1876148	29,624.46		29,624.46
Total Prior Balance:				\$ 29,624.46

To avoid duplicate payments, the Prior Balance reflects what was still due as of October 7, 2024. If payment has been sent close to this date, please verify payment status.



Invoice: 1883336
Invoice Date: October 7, 2024
Client Account: 097807.5000

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/12/24	S. Kinsella	Review settlement procedures motion.	0.20	115.00
09/12/24	K. Nixon	Draft motion to establish settlement procedures.	2.70	1,134.00
09/16/24	S. Stallings	Attention to finalizing and e-filing motion to limit notice, motion for settlement, and fee applications and arrange for service.	2.30	483.00
09/16/24	K. Nixon	Finalize motion to establish settlement procedures and coordinate service of the same.	1.00	420.00
09/18/24	K. Nixon	Attention to certificate of service for recently filed motions and applications.	0.30	126.00
09/19/24	S. Stallings	Attention to prepare, finalizing and e-filing certificate of service.	1.10	231.00
09/26/24	K. Nixon	Email S. Kinsella and S. Stallings re: client meeting.	0.10	42.00
Current Legal Fees:			7.70	\$ 2,551.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	575.00	0.20	115.00
Katherine Nixon	420.00	4.10	1,722.00
Shataia Stallings	210.00	3.40	714.00
Total		7.70	\$ 2,551.00



Invoice:
Invoice Date:

1883336
October 7, 2024
Page: 2

Costs and Other Charges

	<u>Amount</u>
09/04/24 Prof Serv Cogency Global Inc. (P.O. Box 3168 Hicksville NY 11802) - 101714202 - Lien search for EPIC Entities	103.50

Current Costs and Other Charges: \$ 103.50

Invoice Totals

Total for Current Legal Fees: \$ 2,551.00

Total For Current Costs and Other Charges: \$ 103.50

Total For Current Invoice: \$ 2,654.50

Fredrikson

Invoice: 1883337
Invoice Date: October 7, 2024
Client Account: 097807.5001

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through September 30, 2024

Regarding: Asset Analysis and Recovery

Total for Current Legal Fees: \$ 6,302.50

Total For Current Invoice: \$ 6,302.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

Please remit this page with your payment. Thank you. We appreciate your business.

Fredrikson

Invoice: 1883337
Invoice Date: October 7, 2024

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
09/05/24	1876149	6,533.00		6,533.00
Total Prior Balance:				\$ 6,533.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of October 7, 2024. If payment has been sent close to this date, please verify payment status.



Invoice: 1883337
Invoice Date: October 7, 2024
Client Account: 097807.5001

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/03/24	S. Kinsella	Communications with borrower's counsel.	0.10	57.50
09/04/24	S. Stallings	Request and obtain copies of UCC lien searches for certain EPIC entities.	0.30	63.00
09/04/24	S. Kinsella	Meeting with counsel for borrower and follow up communications.	1.00	575.00
09/06/24	S. Kinsella	Phone call with CRO regarding AR collections.	0.20	115.00
09/10/24	S. Kinsella	Analyze project borrower financials.	0.30	172.50
09/11/24	S. Kinsella	Meeting with client and project borrower (1.0); review CRO analysis of project borrower (.3).	1.30	747.50
09/16/24	S. Kinsella	Analyze substantial consolidation requirements.	0.20	115.00
09/18/24	K. Nixon	Review UCC reports and email CRO re: the same.	0.20	84.00
09/23/24	B. Jurek	Review Cass County property records; order O&E reports for 4 parcels.	0.40	88.00
09/23/24	S. Kinsella	Meeting with CRO regarding analysis of project borrowers (1.1); communications with counsel for project borrower (.3); analyze borrower ownership structure (.9).	2.30	1,322.50
09/24/24	B. Jurek	E-mails with title company regarding O&E report requests.	0.20	44.00
09/25/24	S. Kinsella	Phone call with CRO regarding project borrowers.	0.10	57.50
09/27/24	S. Kinsella	Phone call with counsel for Arbor Courts.	0.30	172.50
09/27/24	B. Jurek	E-mails with title company regarding additional O&E report request.	0.20	44.00
09/30/24	S. Kinsella	Prepare for and participate in meeting with CRO regarding project analysis.	2.70	1,552.50

Fredrikson

Invoice:
Invoice Date:

1883337
October 7, 2024
Page: 2

09/30/24	K. Nixon	Meeting with client and prepare notes and outlines for project borrower complaints.	2.60	1,092.00
Current Legal Fees:			12.40	\$ 6,302.50

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	575.00	8.50	4,887.50
Katherine Nixon	420.00	2.80	1,176.00
Breann Jurek	220.00	0.80	176.00
Shataia Stallings	210.00	0.30	63.00
Total		12.40	\$ 6,302.50

Invoice Totals

Total for Current Legal Fees: \$ 6,302.50

Total For Current Invoice: \$ 6,302.50

Fredrikson

Invoice: 1883338
Invoice Date: October 7, 2024
Client Account: 097807.5007

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through September 30, 2024

Regarding: Claims Administration and Objections

Total for Current Legal Fees: \$ 546.00

Total For Current Invoice: \$ 546.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1883338
Invoice Date: October 7, 2024

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
09/05/24	1876151	504.00		504.00
Total Prior Balance:				\$ 504.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of October 7, 2024. If payment has been sent close to this date, please verify payment status.

Fredrikson

Invoice: 1883338
Invoice Date: October 7, 2024
Client Account: 097807.5007

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/09/24	S. Stallings	Review proofs of claims and record registry for each debtor.	0.80	168.00
09/10/24	S. Stallings	Attention to filed proof of claims filed under each of the Debtors.	0.60	126.00
09/12/24	K. Nixon	Review order extending deadline to file POC and email CRO re: the same.	0.10	42.00
09/12/24	S. Stallings	Review claims and analyze filed proofs of claims.	1.00	210.00
Current Legal Fees:			2.50	\$ 546.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Katherine Nixon	420.00	0.10	42.00
Shataia Stallings	210.00	2.40	504.00
Total		2.50	\$ 546.00

Invoice Totals

Total for Current Legal Fees: \$ 546.00

Total For Current Invoice: \$ 546.00

Fredrikson

Invoice: 1883339
Invoice Date: October 7, 2024
Client Account: 097807.5010

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through September 30, 2024

Regarding: Employment and Fee Applications

Total for Current Legal Fees: \$ 3,094.00

Total For Current Invoice: \$ 3,094.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1883339
Invoice Date: October 7, 2024

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
09/05/24	1876152	1,267.00		1,267.00
Total Prior Balance:				\$ 1,267.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of October 7, 2024. If payment has been sent close to this date, please verify payment status.



Invoice: 1883339
 Invoice Date: October 7, 2024
 Client Account: 097807.5010

EPIC Companies Midwest, LLC
 Attn: Patrick Finn
 900 Long Lake Rd, Suite 180
 Lighthouse Management Group, Inc.
 New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/10/24	S. Kinsella	Provide instruction regarding first fee application (.3); review staffing report (.2).	0.50	287.50
09/10/24	K. Nixon	Draft first fee application for F&B (2.5); review compensation procedures for CRO (0.2); prepare first monthly staffing report for CRO (0.6).	3.30	1,386.00
09/11/24	K. Nixon	Revise first fee application for F&B and first monthly staffing report for CRO.	0.90	378.00
09/11/24	S. Kinsella	Review and revise first fee application.	0.80	460.00
09/12/24	K. Nixon	Finalize CRO first staffing report for filing.	0.10	42.00
09/12/24	S. Stallings	Attention to finalizing and e-file staffing report for Lighthouse Management Group.	0.30	63.00
09/16/24	S. Kinsella	Review and finalize fee application.	0.10	57.50
09/16/24	K. Nixon	Finalize F&B fee application and coordinate service of the same and Stinson fee application.	1.00	420.00
Current Legal Fees:			7.00	\$ 3,094.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	575.00	1.40	805.00
Katherine Nixon	420.00	5.30	2,226.00
Shataia Stallings	210.00	0.30	63.00
Total		7.00	\$ 3,094.00



Invoice:
Invoice Date:

1883339
October 7, 2024
Page: 2

Invoice Totals

Total for Current Legal Fees:	\$ 3,094.00
Total For Current Invoice:	\$ 3,094.00

Fredrikson

Invoice: 1883340
Invoice Date: October 7, 2024
Client Account: 097807.5012

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through September 30, 2024

Regarding: Financing and Cash Collateral

Total for Current Legal Fees: \$ 2,510.00

Total For Current Invoice: \$ 2,510.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:



Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

Please remit this page with your payment. Thank you. We appreciate your business.

Fredrikson

Invoice: 1883340
Invoice Date: October 7, 2024

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
09/05/24	1869789	2,875.00		2,875.00
Total Prior Balance:				\$ 2,875.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of October 7, 2024. If payment has been sent close to this date, please verify payment status.



Invoice: 1883340
Invoice Date: October 7, 2024
Client Account: 097807.5012

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/11/24	K. Nixon	Email CRO re: second motion for authorization to use cash collateral.	0.10	42.00
09/11/24	S. Kinsella	Draft second cash collateral motion.	0.90	517.50
09/12/24	S. Kinsella	Revise cash collateral motion.	0.90	517.50
09/13/24	S. Kinsella	Revise cash collateral motion and budget.	1.20	690.00
09/16/24	S. Kinsella	Revise and finalize cash collateral motion.	0.50	287.50
09/16/24	K. Nixon	Finalize cash collateral motion and coordinate service of the same.	0.40	168.00
09/24/24	S. Kinsella	Draft second cash collateral stipulation.	0.50	287.50
Current Legal Fees:			4.50	\$ 2,510.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	575.00	4.00	2,300.00
Katherine Nixon	420.00	0.50	210.00
Total		4.50	\$ 2,510.00

Invoice Totals

Total for Current Legal Fees: \$ 2,510.00

Total For Current Invoice: \$ 2,510.00

Fredrikson

Invoice: 1883357
Invoice Date: October 7, 2024
Client Account: 097807.5013

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through September 30, 2024

Regarding: Meetings and Communications with Creditors

Total for Current Legal Fees: \$ 3,359.50

Total For Current Invoice: \$ 3,359.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

Please remit this page with your payment. Thank you. We appreciate your business.

Fredrikson

Invoice: 1883357
Invoice Date: October 7, 2024

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
09/05/24	1869782	7,232.00		7,232.00
Total Prior Balance:				\$ 7,232.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of October 7, 2024. If payment has been sent close to this date, please verify payment status.



Invoice: 1883357
Invoice Date: October 7, 2024
Client Account: 097807.5013

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/03/24	S. Kinsella	Communications with creditor regarding claim.	0.10	57.50
09/03/24	K. Nixon	Attention to inquiry from certain investors (0.3); attention to execution of confidentiality agreement with UCC (0.4).	0.70	294.00
09/04/24	K. Nixon	Attention to inquiries from certain investors.	0.30	126.00
09/05/24	S. Kinsella	Attention to confidentiality agreement and borrower payment.	0.10	57.50
09/05/24	K. Nixon	Emails re: UCC confidentiality agreement and exchange of information.	0.10	42.00
09/06/24	S. Kinsella	Phone call with creditors' committee counsel (.2); phone call with CRO regarding document production to committee (.2).	0.40	230.00
09/09/24	S. Kinsella	Communications with creditors committee regarding access to documents.	0.10	57.50
09/10/24	S. Kinsella	Meeting with Committee counsel regarding financial records.	1.30	747.50
09/11/24	K. Nixon	Draft motion to limit notice to creditors (1.9); email to counsel for UCC re: timing of upcoming filings (0.1).	2.00	840.00
09/11/24	S. Kinsella	Review motion to limit notice.	0.10	57.50
09/12/24	K. Nixon	Phone call with UCC counsel.	0.20	84.00
09/16/24	S. Kinsella	Review and finalize notice procedures and settlement motions.	0.20	115.00
09/16/24	K. Nixon	Finalize motion to limit notice to creditors and coordinate service of the same.	1.00	420.00
09/17/24	K. Nixon	Attention to inquiry from investor re: removal from matrix.	0.30	126.00
09/23/24	K. Nixon	Email to counsel for UCC re: returned mail.	0.10	42.00



Invoice: 1883357
Invoice Date: October 7, 2024
Page: 2

09/23/24	S. Stallings	Attention to EPIC creditors and change of address.	0.30	63.00
Current Legal Fees:			7.30	\$ 3,359.50

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	575.00	2.30	1,322.50
Katherine Nixon	420.00	4.70	1,974.00
Shataia Stallings	210.00	0.30	63.00
Total		7.30	\$ 3,359.50

Invoice Totals

Total for Current Legal Fees:	\$ 3,359.50
Total For Current Invoice:	\$ 3,359.50

Fredrikson

Invoice: 1883358
Invoice Date: October 7, 2024
Client Account: 097807.5015

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through September 30, 2024

Regarding: Plan and Disclosure Statement

Total for Current Legal Fees: \$ 57.50

Total For Current Invoice: \$ 57.50

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1883358
Invoice Date: October 7, 2024
Client Account: 097807.5015

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/17/24	S. Kinsella	Analyze plan filing deadlines.	0.10	57.50
	Current Legal Fees:		0.10	\$ 57.50

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	575.00	0.10	57.50
Total		0.10	\$ 57.50

Invoice Totals

Total for Current Legal Fees:	\$ 57.50
Total For Current Invoice:	\$ 57.50

Fredrikson

Invoice: 1883359
Invoice Date: October 7, 2024
Client Account: 097807.5018

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through September 30, 2024

Regarding: Reporting

Total for Current Legal Fees: \$ 1,648.00

Total For Current Invoice: \$ 1,648.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1883359
Invoice Date: October 7, 2024

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
09/05/24	1876154	7,565.50		7,565.50
Total Prior Balance:				\$ 7,565.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of October 7, 2024. If payment has been sent close to this date, please verify payment status.



Invoice: 1883359
Invoice Date: October 7, 2024
Client Account: 097807.5018

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/09/24	K. Nixon	Attention to court correspondence re: creditor matrix changes.	0.60	252.00
09/09/24	S. Stallings	Attention to preparing letter to court clerk regarding address changes for certain investors.	0.40	84.00
09/13/24	S. Stallings	Attention to service list for motion to shorten notice, motion for cash collateral, and fee applications.	2.00	420.00
09/14/24	S. Stallings	Attention preparing service list and updating matrix.	1.50	315.00
09/17/24	S. Stallings	Emails regarding updating court matrix (2); prepare correspondence to court clerk regarding creditor address change & e-file (.4).	0.60	126.00
09/17/24	S. Kinsella	Communications with CRO regarding MOR.	0.20	115.00
09/20/24	S. Stallings	Attention to finalize and e-filing monthly operating reports for EPIC debtors (.7); review August bank statements and submit to UST (3).	1.00	210.00
09/20/24	K. Nixon	Attention to August 2024 MORs.	0.30	126.00
Current Legal Fees:			6.60	\$ 1,648.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	575.00	0.20	115.00
Katherine Nixon	420.00	0.90	378.00
Shataia Stallings	210.00	5.50	1,155.00
Total		6.60	\$ 1,648.00



Invoice:
Invoice Date:

1883359
October 7, 2024
Page: 2

Invoice Totals

Total for Current Legal Fees:	\$ 1,648.00
Total For Current Invoice:	\$ 1,648.00

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

Jointly Administered

EPIC Companies Midwest, LLC,
EPIC Companies Midwest 2023, LLC,
EPIC Employee, LLC,
EOLA Capital, LLC, and
EC West Fargo, LLC,

Bankruptcy No. 24-30281
Bankruptcy No. 24-30282
Bankruptcy No. 24-30283
Bankruptcy No. 24-30284
Bankruptcy No. 24-30285

Debtors.

Chapter 11

**NOTICE OF SECOND APPLICATION OF FREDRIKSON & BYRON, P.A. FOR
ALLOWANCE OF FEES AND EXPENSES AS CHAPTER 11 COUNSEL FOR THE
DEBTORS FROM SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

TO: The parties-in-interest as specified in the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court's order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). (ECF No. 124.)

1. **NOTICE IS HEREBY GIVEN** that Fredrikson & Byron, P.A., as Chapter 11 counsel for the Debtors, has filed its second application for allowance of fees and expenses, a copy of which is attached hereto and served upon you.

2. **NOTICE IS FURTHER GIVEN** that any objection to the application must be filed with the Clerk of the United States Bankruptcy Court, whose address is Quentin N. Burdick Courthouse, 655 First Avenue North, Suite 210, Fargo, North Dakota 58102, and served upon the attorney whose name and address is listed below, by **November 6, 2024, which is twenty-one (21) days from the date of the filing of this Notice**. Any objections not filed and served may be deemed waived.

Dated: October 16, 2024

/e/ Steven R. Kinsella

Michael S. Raum (#05676)

FREDRIKSON & BYRON, P.A.

51 Broadway, Suite 400

Fargo, ND 58102-4991

701.237.8200

mraum@fredlaw.com

Steven R. Kinsella (#09514)

Katherine A. Nixon (*pro hac vice* MN #0402772)

FREDRIKSON & BYRON, P.A.

60 South 6th Street, Suite 1500

Minneapolis, MN 55402-4400

612.492.7000

skinsella@fredlaw.com

knixon@fredlaw.com

ATTORNEYS FOR DEBTORS